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MATTER NO.

296-001

December 15, 2022

**VIA CM/ECF**

Hon. Sarah L. Cave  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street, Courtroom 18A  
New York, New York 10007

**RE: Flynn v. Cable News Network, Inc.**  
**Case 1:21-cv-02587 (GHW/SLC)**

Dear Judge Cave:

We represent Plaintiffs, John P. “Jack” Flynn and Leslie A. Flynn (the “Flynnns”) in this matter. We also request various members of the Flynn family in connection with subpoenas issued in this action by counsel for defendant, Cable News Network, Inc. (“CNN”).

We respectfully request an extension of time to and including December 31, 2022 to complete our search of the Flynnns’ email accounts in accordance with paragraphs 3(a), 3(b) and 4 of the Court’s Order entered on November 23, 2022 [*ECF No. 97*].

In accordance with the Court’s Order, we undertook and completed a review of the remaining social media data/files for Lori Flynn, Joseph Flynn, General Flynn, Michel Flynn, Jr. and Mary Flynn O’Neill. The social media data/files were so voluminous that we were only able to complete a review of Jack and Leslie Flynn’s emails prior to the December 15, 2022 deadline.

Given the Flynnns’ counsel’s schedule, including a hearing in the District of New Hampshire on December 21, 2022 and Holiday commitments, we request additional time to complete our review of the Flynnns’ email accounts.

**Certification**

Plaintiffs hereby certify that the required in-person or telephonic conference took place between counsel for the parties. Pursuant to Local Civil Rule 37.2, counsel for the parties conferred on December 14, 2022 and exchanged email regarding the above matters.

Counsel for CNN consents to the Flynn's counsel's request for a brief extension of the deadline to complete counsel's search of the emails.

Yours very truly,

**/s/ *Steven S. Biss***

Steven S. Biss

cc. Anthony C. Carlini, Jr., Esq.  
Counsel for CNN (via email)